

MELLINGER, SANDERS & KARTZMAN, LLC

101 Gibraltar Drive, Suite 2F

Morris Plains, New Jersey 07950

By: Nicole Corona, Esq.

(973) 267-0220

Attorneys for Trustee, Steven P. Kartzman

In Re:

MICHAEL MOSHE COHEN,

Debtor.

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

CHAPTER 7

CASE NO. 14-23412 NLW

**TRUSTEE'S NOTICE OF MOTION
FOR AN ORDER EXTENDING THE BAR
DATE TO FILE A COMPLAINT
OBJECTING TO THE DEBTOR'S
DISCHARGE**

Hearing Date: October 27, 2014 at 10:00 a.m.

Oral Argument Waived Unless Opposition Filed.

TO: Michael Moshe Cohen
7 Stanford Court
West Orange, NJ 07052
Debtor

ROBERTA A. DeANGELIS
United States Trustee
Office of the United States Trustee
One Newark Center, Suite 2100
Newark, New Jersey 07102

PLEASE TAKE NOTICE that on October 27, 2014 at 10:00 a.m. in the forenoon or as soon thereafter as counsel may be heard, the undersigned, Mellinger, Sanders & Kartzman, LLC, attorneys for Trustee, Steven P. Kartzman, shall move before the United States Bankruptcy Court, Martin Luther King, Jr. Federal Building, 50 Walnut Street, 3rd Floor, Newark, New Jersey, the Honorable Novalyn L. Winfield presiding, for the entry of an Order to extend the bar date to file a complaint objecting to the Debtor's discharge pursuant to 11 U.S.C. §707, §727(a) and Fed. R. Bankr. P. 4004 in the captioned matter.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)

If you do not want the Court to enter an Order to extend the bar date to file a complaint objecting to the Debtor's discharge pursuant to 11 U.S.C. §707, §727(a) and Fed. R. Bankr. P. 4004 in the captioned matter, or if you want the Court to consider your views on the motion, then on or before October 20, 2014, you or your attorney must file with the Court a written response explaining your position, at:

Clerk, United States Bankruptcy Court
Martin Luther King, Jr. Federal Building
50 Walnut Street, 3rd Floor
P.O. Box 1352
Newark, New Jersey 07101-1352

If you mail your response to the Court for filing, you must mail it early enough so that the Court will receive it on or before the date stated above.

You must also mail a copy to:

Mellinger, Sanders & Kartzman, LLC
Attn.: Nicole Corona, Esq.
101 Gibraltar Drive, Suite 2F
Morris Plains, New Jersey 07950
Attorneys For Trustee

and

Office of the United States Trustee
Attn.: Roberta A. DeAngelis, Acting United States Trustee
One Newark Center, Suite 2100,
Newark, New Jersey 07102

You must also attend the hearing scheduled to be held on October 27, 2014 before the Honorable Novalyn L. Winfield, United States Bankruptcy Court, Martin Luther King, Jr. Federal Building, 50 Walnut Street, 3rd Floor, Newark, New Jersey.

In support of this motion, the Trustee shall rely on the Certification of Nicole Corona, Esquire submitted herewith. A Statement as to Why No Brief Is Necessary and proposed form of Order are also being submitted herewith.

Oral argument is hereby waived unless opposition is filed.

MELLINGER, SANDERS & KARTZMAN, LLC
Attorneys for Trustee, Steven P. Kartzman

By: /s/ Nicole Corona
NICOLE CORONA, ESQ.

Dated: October 3, 2014

STATEMENT AS TO WHY NO BRIEF IS NECESSARY

In this Notice of Motion, the Trustee seeks an Order to extend the bar date to file a complaint objecting to the Debtor's discharge pursuant to 11 U.S.C. § 707, § 727(a) and Fed. R. Bankr. P. 4004. The sole issue before the Court is whether there are grounds to provide such authorization. The law is well settled, and therefore no brief is required.

Respectfully submitted,

MELLINGER, SANDERS & KARTZMAN, LLC
Attorneys for the Trustee

By: /s/ Nicole Corona
NICOLE CORONA, ESQ.

Dated: October 3, 2014